

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases Noted on Attached Exhibit

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER
DISMISSING WITH PREJUDICE CLAIMS
PURSUANT TO FLORIDA TEVA SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, “Dismissing Plaintiffs”) and Defendant Anda, Inc.,¹ that, pursuant to the election of each Dismissing Plaintiff to participate in the Teva Settlement Agreement attached hereto as Appendix B, all claims of each Dismissing Plaintiff against any Teva Defendant are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

Dated: June 7, 2022

Respectfully submitted,

Agreed as to form and substance:

TEVA

/s/ Eric W. Sitarchuk

Eric W. Sitarchuk

Rebecca J. Hillyer

/s/ Mark J. Dearman

Mark J. Dearman (FL Bar No. 982407)

ROBBINS GELLER RUDMAN

¹ The Teva Settlement Agreement, dated March 29, 2022, is between the State of Florida, Office of Attorney General on the one hand and Teva (as defined therein), on the other, but the Settlement Agreement provides for participation by Dismissing Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Releasees,” which includes, but is not limited to, Anda, Inc. Settlement Agreement §A(bb) (attached as Appendix B). To the extent the Parties discover that any Released Claim of any Dismissing Plaintiff remains pending against any Releasee following filing of this stipulation, the Parties shall stipulate to the dismissal of those claims in a subsequent filing.

MORGAN LEWIS & BOCKIUS LLP
1701 Market Street
Philadelphia, PA 19103-2921
eric.sitarchuk@morganlewis.com
rebecca.hillyer@morganlewis.com
(215) 963-5000

Attorneys for Teva

& DOWD LLP
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
(561) 750-3000
(561) 750-3364 (Fax)
mdearman@rgrdlaw.com

City of Delray Beach (1:18-op-45051-DAP)

/s/ Travis R. Walker

Travis R. Walker (FL Bar No. 36693)
THE LAW OFFICES OF TRAVIS R.
WALKER, P.A.
1100 SE Federal Highway
Stuart, FL 34994
(772) 708-0952
traviswalker@traviswalkerlaw.com

Counsel for City of Stuart (1:20-op-45124-DAP)

/s/ Peter J. Mougey

Peter J. Mougey (FL Bar No. 191825)
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN, BARR,
MOUGEY, P.A.
316 South Baylen Street
Pensacola, FL 32502
(850) 435-7000
pmougey@levinlaw.com

Counsel for

City of Miami Gardens (1:18-op-45873-DAP)
City of New Port Richey (1:19-op-46073-DAP)
City of Niceville (1:21-op-45081-DAP)
City of North Miami (1:18-op-45872-DAP)
City of Ormond Beach (1:19-op-46121-DAP)
City of Pinellas Park (1:18-op-45807-DAP)
City of Saint Petersburg (1:18-op-45701-DAP)
Hernando County (1:19-op-45667-DAP)
Holmes County (1:18-op-45456-DAP)
Miami-Dade County (1:18-op-45552-DAP)
Pasco County (1:18-op-45851-DAP)
Pinellas County (1:18-op-45742-DAP)
Santa Rosa County (1:18-op-45861-DAP)

/s/ Michael C. Moore

Michael C. Moore
MIKE MOORE LAW FIRM, LLC
P.O. Box 321048
Flowood, MS 39232
(601) 933-0070
mm@mikemoorelawfirm.com

Counsel for Hillsborough County (1:18-op-46281-DAP) and City of Tampa (1:18-op-46282-DAP)

/s/ Shayna E. Sacks

Shayna E. Sacks
NAPOLI SHKOLNIK, PLLC
360 Lexington Avenue, 11th Floor
New York, NY 10017
(212) 397-1000
ssacks@napolilaw.com

*Counsel for
Alachua County (1:18-op-45685-DAP)
Levy County (1:18-op-46119-DAP)
Okaloosa County (1:19-op-45894-DAP)
Osceola County (1:18-op-45669-DAP)
Palm Beach County (1:18-op-46121-DAP)
Walton County (1:19-op-45423-DAP)*

/s/ Keith Jackson

Keith Jackson
RILEY & JACKSON, P.C.
3530 Independence Drive
Birmingham, AL 35209
(205) 879-5000
(205) 879-5901(Fax)
www.rileyjacksonlaw.com

Counsel for the City of Lynn Haven (19:op-46006-DAP)

/s/ Donald A. Broggi

Donald A. Broggi
SCOTT+SCOTT ATTORNEYS AT LAW LLP
230 Park Avenue, 17th Floor

New York, NY 10169
(212) 519-0518
dbroggi@scott-scott.com

Counsel for City of Jacksonville (1:18-op-46120-DAP)

SO ORDERED this ___ day of June, 2022.

Hon. Dan Aaron Polster
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/ Mark J. Dearman

Mark J. Dearman (FL Bar No. 982407)

ROBBINS GELLER RUDMAN

& DOWD LLP

120 East Palmetto Park Road, Suite 500

Boca Raton, FL 33432

(561) 750-3000

(561) 750-3364 (Fax)

mdearman@rgrdlaw.com